

# Holland Knight

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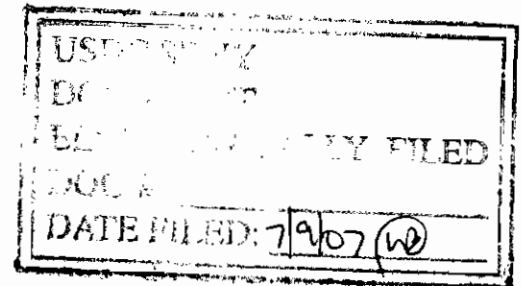
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July 2, 2007

**BY HAND**

Honorable Sidney H. Stein  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312



RECEIVED

Re: North Offshore AS v. Rolv Berg Drive AS  
SDNY Docket #: 07 Civ. 3095 (SHS)  
Our File: 500177-03206

Honorable Sir:

We are counsel for plaintiff North Offshore AS ("North Offshore") in the referenced matter.

We are writing in connection with North Offshore's request to file a Verified Third Amended Complaint, as well as for an amended order of maritime attachment which reflects the amended amount sought in the Verified Third Amended Complaint. As Rule 15(a) requires that a party may amend its pleadings only by leave of court after having once filed an amended pleading, we write to request such leave. As the defendant has not appeared to date, in the interest of reducing the burden on the Court we have made our application by letter.

It is well-settled that amendments under Rule 15(a) should be liberally granted when the movant shows good cause for the proposed amendment. Plaintiff's proposed Verified Third Amended Complaint is identical to its Verified Second Amended Complaint with the exception of deleting a claim for \$50,000 which now has been paid and adding the final additional hire claim and redelivery claim under the Charter in the net added amount of \$235,089.90, which claims matured since we last wrote Your Honor on June 5, 2007. While Plaintiff could commence a separate proceeding based on the new claim and then list this matter as a related claim subject to consolidation, the amendment proposed reduces the administrative burden without prejudicing the defendant.

2 - Honorable Sidney H. Stein  
July 2, 2007

With regard to further amendments, none are expected because the Charter between the parties has been concluded and the amendments provided in the Verified Third Amended Complaint recite the remaining claims against Defendant of which Plaintiff is aware.

We are grateful for Your Honor's consideration of Plaintiff's application, and we look forward to receiving Your Honor's decision in due course. For the ease of the Court, we have provided a "So Ordered" line below for Your Honor's endorsement in the event that the application is granted.

Respectfully submitted,  
HOLLAND & KNIGHT LLP

By:   
Michael J. Frevola

MJF/mf

7/9/07

*verified Third Amended Complaint may be filed within 10 days.*

SO ORDERED:

U.S.D.J.

